

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO

NORMAN HUSAR, individually and on
behalf of all others similarly situated,

Plaintiff,

Civil Action No. 1:21-cv-00204-MRB

vs.

Hon. Michael R. Barrett

GENERAL MOTORS LLC, a Delaware
limited liability company,

Defendant.

JOINT MOTION TO EXTEND DEADLINES

Plaintiff Norman Husar and Defendant General Motors LLC (“GM”) respectfully request that this Court extend by fourteen days both the deadline for GM to respond to Plaintiff’s Complaint (ECF No. 1), and the deadline for Plaintiff to respond to GM’s Offer to Cure Pursuant to Ohio Revised Code § 1345.092 (ECF No. 8). In support of this Motion, the parties state as follows:

1. Plaintiff filed a Complaint on March 25, 2021. After receiving a stipulated extension on April 9, GM’s response to the Complaint is currently due on May 7, 2021.
2. Due to conflicts on GM’s counsel’s calendar, and GM’s continued factual investigation in this matter, GM requires an additional fourteen days, until May 21, 2021, to finalize its responsive pleading. Plaintiff does not oppose the relief requested.
3. On April 22, 2021, GM filed and served an Offer to Cure Pursuant to Ohio Revised Code § 1345.092. In accordance with Ohio Revised Code § 1345.092(B), Plaintiff’s response to the Offer is currently due on May 22, 2021.

4. Plaintiff requires an additional fourteen days, until June 5, 2021, to consider and respond to the Offer. GM does not oppose the relief requested.

5. A proposed Order granting the relief is attached as **Exhibit A**.

Respectfully submitted,

/s/ Marc E. Dann (email permission 4/27)

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Attorney for General Motors LLC

CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2021, I caused the foregoing document to be filed with the Clerk of the Court with a copy being served on all counsel of record by the court CM/ECF electronic filing system.

By: /s/ Kyle M. Asher

Kyle M. Asher (0098459)

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